

FILED

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	<u>SUPERSEDING INFORMATION</u>
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	
)	CASE NO. <u>1:18CR518</u>
EDWARD R. MARRERO,)	Title 18, United States Code,
)	Sections 1001(a)(2), 2251(a), and
Defendant.)	2252(a)(4)(B)

COUNT 1

(Sexual Exploitation of Children, 18 U.S.C. § 2251(a))

The United States Attorney charges:

1. On or about March 5, 2011, in the Northern District of Ohio, Eastern Division, Defendant EDWARD R. MARRERO did use, persuade, induce, entice and coerce a minor (to wit: Minor Victim No. 1, whose identity is known to the Grand Jury) to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct and such visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2251(a).

COUNT 2

(Sexual Exploitation of Children, 18 U.S.C. § 2251(a))

The United States Attorney further charges:

2. On or about March 19, 2011, in the Northern District of Ohio, Eastern Division, Defendant EDWARD R. MARRERO did use, persuade, induce, entice and coerce a minor (to

wit: Minor Victim No. 1, whose identity is known to the Grand Jury) to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct and such visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2251(a).

COUNT 3

(Sexual Exploitation of Children, 18 U.S.C. § 2251(a))

The United States Attorney further charges:

3. On or about March 24, 2011, in the Northern District of Ohio, Eastern Division, Defendant EDWARD R. MARRERO did use, persuade, induce, entice and coerce a minor (to wit: Minor Victim No. 1, whose identity is known to the Grand Jury) to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct and such visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2251(a).

COUNT 4

(Sexual Exploitation of Children, 18 U.S.C. § 2251(a))

The United States Attorney further charges:

4. On or about April 2, 2011, in the Northern District of Ohio, Eastern Division, Defendant EDWARD R. MARRERO did use, persuade, induce, entice and coerce a minor (to wit: Minor Victim No. 1, whose identity is known to the Grand Jury) to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of

producing a visual depiction of such conduct and such visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2251(a).

COUNT 5

(Possession of Visual Depictions of a Minor Engaged in Sexually Explicit Conduct,
18 U.S.C. § 2252(a)(4)(B))

The United States Attorney further charges:

5. From on or about March 5, 2011 through on or about August 4, 2015, in the Northern District of Ohio, Eastern Division, Defendant EDWARD R. MARRERO did knowingly possess a computer containing visual depictions of a real minor engaged in sexually explicit conduct, which visual depictions, were produced using materials which had been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, in violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 6

(False Statement, 18 U.S.C. § 1001(a)(2))

The United States Attorney further charges:

On or about May 16, 2017, in the Northern District of Ohio, Eastern Division, defendant, EDWARD R. MARRERO, did knowingly and willfully make several material false statements, in a matter within the jurisdiction of the executive branch of the Government of the United States, well knowing at the time he made the statements to Special Agents of the Federal Bureau

of Investigation that such statements were false, and the matter related to an offense under chapter 110, in violation of Title 18, United States Code, Section 1001.

JUSTIN E. HERDMAN
United States Attorney


EDWARD F. FERAN, Chief
General Crimes Unit